

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE:

ALEXIS MONTANEZ OSORIO

DEBTOR

CASE NO. 20-01510/EAG

CHAPTER 13

**DEBTOR'S MOTION REQUESTING ORDER
RE: AUTHORIZATION TO USE FUNDS FROM GOVERNMENT
SPECIAL BONUS**

TO THE HONORABLE COURT:

NOW COMES, ALEXIS MONTANEZ OSORIO, the Debtor, through the undersigned attorney, and very respectfully states and prays as follows:

1. On December March 28, 2020, the Debtor filed for protection under Chapter 13 of the Bankruptcy Code, 11 U.S.C. §§1301 et seq.
2. The Debtor has been employed for the last 18 years as an fireman with the Puerto Rico Fire Department.
3. On December 1, 2022 the Debtor received the proceeds from a Puerto Rico Government "special bonus" in the total amount of \$2,521.24. Attached is copy of pay-stub received by Debtor as evidence of having received said bonus.
4. The Debtor respectfully submits to the Court that he used these funds from the "special bonus" to pay for the following "reasonable and necessary" expense: new car tires and house repairs expenses. Attached is copy of estimates/invoices for these expenses.
5. The Debtor will pay to the Trustee the unused portion or balance from said bonus in the sum of \$145.24, to fund the confirmed Plan.

6. It is to be noted that the above stated extraordinary expenses are not considered in Debtor's scheduled budget. See: *Schedules I & J*, Docket No. 37.

7. The Debtor used the funds from the Puerto Rico Government "special bonus" proceeds to pay for these "reasonable and necessary" expenses. Furthermore, the Debtor is living within a very "tight" budget which barely covers his living expenses and a Plan payment of \$375.00.

8. Based on the above stated, the Debtor respectfully requests this Court to Order the authorization of the use of these funds to allow the Debtor to pay for the above mentioned "necessary and reasonable" expenses.

WHEREFORE, the Debtor, through the undersigned attorney respectfully request that this Honorable Court grant the foregoing motion and allow the use of the funds from the Puerto Rico Government "special bonus" proceeds to pay for the above stated expenses, in the above captioned case.

NOTICE: Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006 (f) if you were served by mail, any party against whom this paper has been served, or any other party to the action that objects to the relief sought herein shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF system which will send notice of same to the Chapter 13 Trustee; I also certify that a copy of this motion was sent via US Mail to Debtor to his address of record.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 21st day of December 2022.

/s/ Roberto Figueroa Carrasquillo
ROBERTO FIGUEROA CARRASQUILLO
USDC #203614
ATTORNEY FOR PETITIONER
PO BOX 186 CAGUAS PR 00726
TEL NO 787-744-7699/787-963-7699
Email: rfc@rfigueroalaw.com

178260

Kupir by Puerto x Vatrues

CUSTOMER'S ORDER NO.		DEPARTMENT		DATE 5/Dec/2022	
NAME Alexis Montañez Otero					
ADDRESS Torres de Centro					
CITY, STATE, ZIP Caguas # Registo Comercio 1264927-0010					
SOLD BY		CASH	C.O.D.	CHARGE	ON. ACCT.
				MOSE. RETD.	PAID OUT

QUANTITY	DESCRIPTION	PRICE	AMOUNT
1 5	Packs Full Glass		
2	36 x 80		
3			
4	Installed		
5			
6			
7			
8			
9			
10			
11			
12			
13			
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15			
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17			
18			

DER \$2,000.00

Al Finalizar Bq. \$100.00

Tot. \$2,100.00

Balance \$2,100.00

RECEIVED BY *[Signature]*

KEEP THIS SLIP FOR REFERENCE

182962

Purchase Order

TO		SHIP TO	
ADDRESS		ADDRESS	
CITY, STATE, ZIP		CITY, STATE, ZIP	
DATE	DATE REQUIRED	TERMS	HOW SHIPPED
			REQ. NO. OR DEPT.
			FOR

QUANTITY ORDERED	QUANTITY RECEIVED	PLEASE SUPPLY LISTED ITEMS BELOW	PRICE	UNIT
1		Toyota Corolla Trd 5 2005	\$376.00	
2		4 Tomas 195-65-15 Trd		
3		Montera y Palanca		
4		Garantia 90 Dias		
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IMPORTANT

Purchase Order Number must appear on all invoices - packaging, etc.
Please send this immediately if you are unable to complete the order by date specified.

Please send _____ copies of your INVOICE with ORIGINAL BILL OF LADING.

PURCHASING AGENT

ORIGINAL

51-11

045 Dept. de Seguridad Publica
235 AVE ARTERIAL HOSTOS
CAPITAL CENTER TORRE NORTE SUITE103
HATO REY, PR 00918

Grupo de Pago: SM -Quincenal
Desde: 12/02/2022
Hasta: 12/02/2022
Aviso #: 4805912
Fecha Aviso: 12/01/2022

ALEXIS MONTANEZ OSORIO BO.TOMAS DE CASTRO SECTOR MONTANAS #1 CAGUAS, PR 00725 SS: 199	# Emplead 2499 Dept: 0450424140-Neg Ext Distrito Caguas Lugar: Parque Distrito De Caguas Titulo: Bombero Sueldo: \$2,850.00 Monthly	DATA IMP: Federal PR Estado Civil: Single Head of Household Concesiones: 0 0 Pct. Adcl.: Cant. Adcl.:
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HORAS E INGRESOS						IMPUESTOS		
Descripcion	Sueldo	Corriente	Ingresos	Horas	Acumulado	Descripcion	Corriente	Acumulado
Bonificaciones			2,954.00		2,954.00	Fed FICA Med Hospital Ins / EE	42.83	451.73
Bono de Navidad			0.00		600.00	Fed OASDI/Disability - EE	183.15	1,931.55
Pago de Salarios Regulares			0.00	1,904.00	27,287.50	PR Withholding	206.78	1,048.78
Pago Retroactivo Regular			0.00		312.50			
Total:			2,954.00	1,904.00	31,154.00	Total:	432.76	3,432.06

DEDUCCIONES			DEDUCCIONES GENERALES			BENEFICIOS PATRONALES PAGADOS		
Descripcion	Corriente	Acumulado	Descripcion	Corriente	Acumulado	Descripcion	Corriente	Acumulado
GPR Plan Aport. Definidas	0.00	2,346.01	SI-Seg Incap. Obligatorio	0.00	64.93	FSED Disability Plan	115.21	1,215.09
			SM-First Medical Health Plan	0.00	539.00	SM-First Medical Health Plan	0.00	2,200.00
			SC-TRANS OCEANIC LIFE	0.00	154.66			
			DM-GOB SEG SOC CHOFERES	0.00	23.98			
			OS-SINDICATO BOMBEROS UNIDOS	0.00	220.00			
			Ahorros-AEELA	0.00	828.07			
Total:	0.00	2,346.01	Total:	0.00	1,830.64	* Tributable		

TOTAL BRUTO		BRUTO TRIBUT. FED		TOTAL IMPUESTOS		DEDUCCIONES TOTALES		PAGA NETA
Corriente:	2,954.00		0.00		432.76		0.00	2,521.24
Acumulado:	31,154.00		0.00		3,432.06		4,176.65	23,545.29
Vacacion	Horas	Enfermedad	Horas	Tiempo Comp.	Horas	DISTRIBUCION PAGA NETA		
Balance Previo:	0.00	Balance Previo:	0.00	Balance Previo:	0.00	Aviso #4805912		
+ Acumulado:	0.00	+ Acumulado:	0.00	+ Acumulado:	0.00	Total:		
- Utilizado:	0.00	- Utilizado:	0.00	- Utilizado:	0.00	2,521.24		
Balance Final:	0.00	Balance Final:	0.00	Balance Final:	0.00			

Los balances de licencias corresponden al periodo de:

MENSAJE:

Dept. de Seguridad Publica
235 AVE ARTERIAL HOSTOS
CAPITAL CENTER TORRE NORTE SUITE103
HATO REY, PR 00918

Fecha
12/01/2022

Aviso No.
4805912

Cant. Deposito: \$2,521.24

A la
Cuenta(s) De

ALEXIS MONTANEZ OSORIO
BO.TOMAS DE CASTRO
SECTOR MONTANAS #1
CAGUAS, PR 00725
Localizacion: Parque Distrito De Caguas

DISTRIBUCION DE DEPOSITO DIRECTO		
Tipo de Cuenta	Numero de Cuenta	Cant. Deposito
Checking	XXXXXXXXXXXXXXXXXX	2,521.24
Total:		2,521.24

NO-NEGOCIABLE